

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

SCOTT STERLING, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

IRIS ENERGY LIMITED, DANIEL
ROBERTS, WILLIAM ROBERTS,
BELINDA NUCIFORA, DAVID
BARTHOLOMEW, CHRISTOPHER
GUZOWSKI, and MICHAEL ALFRED,

Defendants.

Case No. 2:22-cv-07273-JMV-MAH

STIPULATION AND [PROPOSED]
ORDER FOR FILING OF AMENDED
COMPLAINT AND MOVING OR
OTHERWISE RESPONDING TO
AMENDED COMPLAINT

WHEREAS, by Consent Order dated February 3, 2023, this Court directed Plaintiff and Defendants to meet and confer and jointly submit for the Court's approval, within fourteen days of the Court's entry of a Lead Plaintiff Order, a proposed schedule for the filing of an amended complaint and any motion to dismiss or other response thereto (ECF No. 14);

WHEREAS, on March 27, 2023, following the submission of motions for the appointment of Lead Plaintiff, the Court appointed the IREN Investor Group as Lead Plaintiff, Bottini & Bottini, Inc. as Lead Counsel for the putative class, and Cohn Lifland Pearlman Herrmann & Knopf LLP as Liaison Counsel (ECF No. 34); and

WHEREAS, the Parties have conferred and are in agreement on a schedule for the filing of Lead Plaintiff's Amended Complaint and for Defendants' response thereto.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys for the Parties, as follows:

1. Defendants shall not be required to answer, move, or otherwise respond to the current Complaint.
2. Lead Plaintiff shall file its Amended Complaint, which shall supersede the current Complaint, by June 6, 2023.
3. Defendants' deadline to move to dismiss, answer, or otherwise respond to the Amended Complaint is August 4, 2023.
4. In the event Defendants elect to move to dismiss the Amended Complaint, Lead Plaintiff shall file its opposition to Defendants' motion to dismiss by October 4, 2023.
5. Defendants shall file their reply in further support of their motion to dismiss the Amended Complaint by November 17, 2023.

6. Nothing in this stipulation shall prejudice the right of any Party to seek further extensions on the consent of the other Parties or from the Court.

Respectfully submitted this 7th day of April 2023, by:

DATED: April 7, 2023

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DATED: April 6, 2023

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Attorneys for Defendants

IT IS SO ORDERED.

DATED: _____

THE HONORABLE JOHN MICHAEL VAZQUEZ
UNITED STATES DISTRICT JUDGE